

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EIG Energy Fund XIV, L.P.,
EIG Energy Fund XIV-A, L.P.,
EIG Energy Fund XIV-B, L.P.,
EIG Energy Fund XIV (Cayman), L.P.,
EIG Energy Fund XV, L.P.,
EIG Energy Fund XV-A, L.P.,
EIG Energy Fund XV-B, L.P., and
EIG Energy Fund XV (Cayman), L.P.

Plaintiffs,

-against

Keppel Offshore & Marine Ltd.,

Defendant.

No. 18-CV-01047 (PGG)

**APPENDIX TO DEFENDANT'S LOCAL RULE 56.1 RESPONSE AND
COUNTERSTATEMENT IN OPPOSITION TO PLAINTIFFS'
MOTION FOR SUMMARY JUDGMENT**

Exhibit No.	Description	Bates	Date	Redactions
1	Complaint (Dkt. 17)	--	4/30/2018	None
2	EIG's Responses to RFAs	--	6/4/2021	None
3	<u>Accused in Petrobras Corruption Case to Repay \$165 Million</u> , Industry Week, November 18, 2021	--	11/18/2021	None
4	Atwood Oceanics Form 10-K, December 31, 2011	--	12/31/2011	None
5	<u>BNDES Sees Oil Rig Supplier Sete Brasil Reorganization by June</u> , Reuters, April 16, 2015	--	4/16/2015	None
6	<u>Brazilian Prosecutors File Charges in Corruption Investigation</u> , Wall Street Journal, December 11, 2014	--	12/11/2014	None

Exhibit No.	Description	Bates	Date	Redactions
7	Diamond Offshore Drilling Inc. Form 8-K, April 27, 2020	--	4/27/2020	None
8	Diamond Offshore Drilling Ltd. Form 10-K, December 31, 2011	--	12/31/2011	None
9	<u>Diamond Offshore Files for Bankruptcy</u> , Reuters, April 27, 2020	--	4/27/2020	None
10	Ensco plc Form 10-K, December 31, 2011	--	12/31/2011	None
11	Foreign Exchange Rates, Federal Reserve	--	10/18/2021	None
12	<u>Former Petrobras Executive to Return \$100 Million in Corruption Probe</u> , Wall Street Journal, December 3, 2014	--	12/3/2014	None
13	Keppel Corp. Report to Shareholders 2009	--	2009	None
14	Keppel Corp. Report to Shareholders 2010	--	2010	None
15	Keppel Corp. Report to Shareholders 2011	--	2011	None
16	Keppel Corp. Report to Shareholders 2012	--	2012	None
17	Keppel Corp. Report to Shareholders 2013	--	2013	None
18	Keppel Corp. Report to Shareholders 2014	--	2014	None
19	Keppel Corp. Report to Shareholders 2015	--	2015	None
20	Keppel Corp. Report to Shareholders 2016	--	2016	None
21	<u>Mass Offshore Oil-Servicer Busts Imperil \$30 Billion of Debt</u> , Bloomberg, August 19, 2020	--	8/19/2020	None

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22	<u>Mothballing the World's Fanciest Oil Rigs Is a Massive Gamble</u> Bloomberg, September 20, 2016	--	9/20/2016	None
23	Noble Corporation plc Form 10-K, December 31, 2011	--	12/31/2011	None
24	Noble Corporation plc Form 8-K, July 31, 2020	--	7/31/2020	None
25	<u>Offshore Rig Operators Reel from Oil Price Rout</u> , Financial Times, April 24, 2016	--	4/24/2016	None
26	<u>Offshore-Rig Operator Noble Files for Bankruptcy</u> , The Wall Street Journal, July 31, 2020	--	7/31/2020	None
27	<u>Petrobras Rig-Builder Said Close to Receiving Delayed BNDES Loan</u> , Bloomberg, January 14, 2015	--	1/14/2015	None
28	<u>Petrobras scandal: Brazil's energy giant under pressure</u> , BBC, November 21, 2014	--	11/21/2014	None
29	<u>Petrobras's \$100 Million Man Tops Graft Haul in Scandal</u> , Bloomberg, December 3, 2014	--	12/3/2014	None
30	Response to Media Reports on Ongoing Investigation on Petrobras	--	2016	None
31	Rowan Companies Form 10-K, December 31, 2011	--	12/31/2011	None
32	<u>Seadrill files for Chapter 11 bankruptcy</u> , Reuters, September 12, 2017	--	9/12/2017	None
33	<u>Seadrill Limited: Seadrill Limited (SDRL): Asia Offshore Drilling Chapter 11 Filings</u> , Dow Jones Institutional News, February 7, 2021	--	2/7/2021	None
34	Seadrill Ltd. Form 10-K, December 31, 2011	--	12/31/2011	None

Exhibit No.	Description	Bates	Date	Redactions
35	Seadrill Ltd. Form 6-K's, February 2021	--	2/2021	None
36	Seadrill Ltd. Form 6-K, September 13, 2017	--	9/13/2017	None
37	<u>Shareholders Approve Sete Brasil Bankruptcy</u> , Oil Daily, April 22, 2016	--	4/22/2016	None
38	<u>The Sete Brasil Surprise?</u> , Credit Suisse Equity Research, February 13, 2012	--	2/13/2012	None
39	Timeline – Key moments in Brazil's Petrobras corruption probe, Reuters, August 14, 2015	--	8/14/2015	None
40	<u>Valaris Declares Chapter 11 Bankruptcy, In Restructuring Agreement</u> , Dow Jones Institutional News, August 19, 2020	--	8/19/2020	None
41	Valaris plc Form 8-K, August 19, 2020	--	8/19/2020	None
42	Transcript excerpts of August 5, 2021 Deposition of Alvin Albe Jr.	--	8/5/2021	None
43	Transcript excerpts of July 22, 2021 Deposition of Jeffery Anderson	--	7/22/2021	None
44	Transcript excerpts of June 24, 2021 Deposition of Jeffrey Chow	--	6/24/2021	None
45	Transcript excerpts of July 20, 2021 Deposition of Kevin Corrigan and Rule 30(b)(6) Deposition of EIG	--	7/20/2021	None
46	Transcript excerpts of May 27, 2021 Deposition of Simon Hayden	--	5/27/2021	None
47	Transcript excerpts of July 9, 2021 Deposition of Loh Chin Hua	--	7/9/2021	None
48	Transcript excerpts of June 4, 2021 Deposition of Kevin Lowder	--	6/4/2021	None

Exhibit No.	Description	Bates	Date	Redactions
49	Transcript excerpts of July 2, 2021 Deposition of Aziz Merchant	--	7/2/2021	None
50	Transcript excerpts of May 14, 2021 Deposition of Hoshnav Patel	--	5/14/2021	None
51	Transcript excerpts of June 17, 2021 Deposition of Kurt Talbot	--	6/17/2021	None
52	Transcript excerpts of July 15, 2021 Deposition of Tan Leong Peng and Rule 30(b)(6) Deposition of Keppel	--	7/15/2021	None
53	Transcript excerpts of July 16, 2021 Deposition of Tan Leong Peng and Rule 30(b)(6) Deposition of Keppel	--	7/16/2021	None
54	Transcript excerpts of July 30, 2021 Deposition of Blair Thomas and Rule 30(b)(6) Deposition of EIG	--	7/30/2021	None
55	Transcript excerpts of June 11, 2021 Deposition of Randall Wade	--	6/11/2021	None
56	Transcript excerpts of January 27, 2021 Deposition of Jose Bernardes	EIG_KEP_00288353-851	1/27/2021	None
57	Transcript excerpts of October 16, 2020 Deposition of Kevin Corrigan and Rule 30(b)(6) Deposition of EIG	EIG_KEP_00257407-787	10/16/2020	None
58	Transcript excerpts of October 29, 2020 Deposition of Simon Hayden	EIG_KEP_00258738-096	10/29/2020	None
59	Transcript excerpts of December 10, 2020 Deposition of Kevin Lowder	EIG_KEP_00262238-568	12/10/2020	None
60	Transcript excerpts of December 16, 2020 Deposition of Blair Thomas and Rule 30(b)(6) Deposition of EIG	EIG_KEP_00262932-229	12/16/2020	None
61	DX010 - Sete Brasil – June 2013 Update	EIG_KEP_00079321	6/2011	None
62	DX032 - Sete Brasil/Sete International Memorandum	EIG_KEP_00075097-099	2/7/2011	None

Exhibit No.	Description	Bates	Date	Redactions
63	DX034 - Brazilian Drillship-Generic Analysis Memorandum	EIG_KEP_00078361	2/24/2011	None
64	DX036 - Ultra-Deepwater Drillship Opportunities, Brazil Memorandum	EIG_KEP_00075075-079	3/1/2011	None
65	DX037 - Sete Brazil Memorandum	EIG_KEP_00262580-588	4/4/2011	None
66	DX039 - June 2011 Investment Recommendation	EIG_KEP_00077790-832	6/27/2011	None
67	DX058 - Fund XV Investment Summaries	EIG_KEP_00290059-077	12/31/2014	None
68	DX061 - Pre-Salt Oil Rigs Project	EIG_KEP_00000130-141	10/2011	None
69	DX062 - Private Placement Confidential Information Memorandum	EIG_KEP_00000001-091	9/2011	None
70	DX074 - Investment Committee Meeting Minutes	EIG_KEP_00260322	6/27/2011	None
71	DX075 - September 2011 Investment Recommendation	EIG_KEP_00260390-432	9/16/2011	None
72	DX077 - Email from B. Thomas to K. Talbot	EIG_KEP_00260519-533	2/1/2014	None
73	DX083 - Brazil's Energy and Infrastructure Landscape	EIG_KEP_00258521-539	4/2014	None
74	DX086 - Email from K. Corrigan to P. Abejar	EIG_KEP_00077755-756	6/29/2011	None
75	DX087 - Second Round of Private Placements for the Sondas Project	EIG_KEP_00049151-161	6/30/2011	None
76	DX089 - First Amendment and Restatement	EIG_KEP_00048626-643	9/8/2011	None
77	DX092 - Email from K. Corrigan to B. Olsen	BARRINGTON_ET_0000 0596	7/27/2011	None
78	DX093 - Email from K. Corrigan to B. Olsen	BARRINGTON_ET_0000 0446-448	8/1/2011	None

Exhibit No.	Description	Bates	Date	Redactions
79	DX095 - Email from K. Corrigan to J. Starup	EIG_KEP_00121469-470	3/9/2012	None
80	DX096 - Email from K. Corrigan to J. Bernardes	EIG_KEP_00258150-152	6/25/2014	None
81	DX107 - EIG Investment Committee Agenda	EIG_KEP_00258668-705	9/2/2014	None
82	DX109 - Email from J. Magela Bernardes	EIG_KEP_00263664-667	11/18/2014	None
83	PX006 - Email from J. Chow to L. Tan	KEPPEL00547339-340	1/10/2011	None
84	PX014 - Email and attachment from T. Sam to T. Yang, <i>et al.</i>	KEPPEL00410554-0594	10/30/2011	None
85	PX025 - Email and attachments from N. Marsuki to J. Chow	KEPPEL_00045251-294	8/7/2012	None
86	PX038 - Financial Model attached to PX014	KEPPEL00410559	--	None
87	PX051 - EPC Contract between Frade Drilling and Fernvale	KEPPEL00610466-558	8/2/2012	KOM Redactions
88	PX052 - EPC Contract between Brauchy Drilling and Fernvale	KEPPEL00610372-464	8/2/2012	KOM Redactions
89	PX053 - EPC Contract between Portogalo Drilling and Fernvale	KEPPEL00610654-746	8/2/2012	KOM Redactions
90	PX054 - EPC Contract between Mangaratiba Drilling and Fernvale	KEPPEL00555548-640	8/2/2012	KOM Redactions
91	PX055 - EPC Contract between Botinas Drilling and Fernvale	KEPPEL005555263-355	8/2/2012	KOM Redactions
92	PX062 - Email from E. Namtvedt to A. Amirali, <i>et al.</i>	KEPPEL00551033-034	8/2/2012	None
93	PX070 - EPC Contract between Urca Drilling and Fernvale	KEPPEL000490690-768	12/16/2011	KOM Redactions
94	PX086 - Email from K. Corrigan to P. Abejar with attachment	EIG_KEP 00077755-756 (certified translation)	6/29/2011	None

Exhibit No.	Description	Bates	Date	Redactions
95	PX087 - Drilling Rigs in Brazil Project Presentation	KEPPEL00049888-924	1/12/2011	None
96	PX090 - Email from S. M. Chia to L. Tan	KEPPEL00024030-032	7/5/2011	None
97	PX095 - Email from C. Shimabukuro to K.C. Kwok	KEPPEL00011126-128	11/8/2011	KOM Redactions
98	PX108 - Letter to the Sete Brasil S.A. Shareholder.	EIG_KEP_00176682	12/6/2018	None
99	Email from G. Milanesi to B. Olsen	BARRINGTON_ET_0000 0486-495	8/8/2011	None
100	Email from K. Corrigan to B. Thomas	BARRINGTON_ET_0000 0651-654	8/23/2011	None
101	Technical Due Diligence Review	EIG_KEP_00026002-193	3/7/2013	None
102	Email from lijh_t@china-inv.cn to Luiz Reis	EIG_KEP_00048709-713	9/26/2011	None
103	EIG Energy Fund XV Annual Report	EIG_KEP_00052509-551	12/31/2013	None
104	Email and attachment from D. Castro to K. Corrigan	EIG_KEP_00075177-213 (certified translation)	9/27/2010	None
105	Sete Brasil June 30, 2012	EIG_KEP_00094179-182	6/30/2012	None
106	Email from T. Calca to aires@bradescobbi.com.br, <i>et al.</i>	EIG_KEP_00095123-129 (certified translation)	5/29/2013	None
107	Sete Brasil September 30, 2012	EIG_KEP_00098236	9/30/2012	None
108	Email from B. Thomas to N. Ravidram and D. Lemke with attachment	EIG_KEP_00134490-498	2/18/2015	None
109	Sete Brasil Discussion Materials	EIG_KEP_00134861-871	7/27/2015	None
110	Email from A. Marcel to P. Aujla	EIG_KEP_00135540-544	9/2/2014	None
111	Email from J. Bernardes to B. Thomas and R Hawkins	EIG_KEP_00140086-088	12/24/2014	None
112	Wire Authorization Sheet	EIG_KEP_00147165-168	12/8/2014	EIG Redactions

Exhibit No.	Description	Bates	Date	Redactions
113	Sete Brasil - March 2014 Update	EIG_KEP_00156130	3/2014	None
114	Rigs Project Table of Contents	EIG_KEP_00166208 -209 (certified translation)	--	None
115	Sete Brasil - June 2015 Update	EIG_KEP_00210300	6/2015	None
116	Sete Brasil Model	EIG_KEP_00210425	--	None
117	Deutsche Bank Statement of Account No. 1	EIG_KEP_00249977	1/6/2015	EIG Redactions
118	Email from H. Patel to K. Corrigan and S. Hayden	EIG_KEP_00251502-508	3/28/2012	EIG Redactions
119	Email from H. Patel to S. Hayden	EIG_KEP_00251523-529	3/28/2012	EIG Redactions
120	Meeting invitation for Kevin Corrigan	EIG_KEP_00257850-852	10/19/2010	None
121	Email from L. Reis to K. Corrigan, <i>et al.</i>	EIG_KEP_00257969-971	6/3/2011	None
122	Email from K. Corrigan to C. Vogel, <i>et al.</i>	EIG_KEP_00258104-106	6/23/2011	None
123	Email from C. Vogel to P. Songsanand <i>et al.</i>	EIG_KEP_00258109-112	1/13/2012	None
124	Email from K. Corrigan to J. Bernardes	EIG_KEP_00258150-152	6/25/2014	None
125	Email from J. Bernardes to B. Thomas <i>et al.</i>	EIG_KEP_00258727-728	3/10/2015	None
126	Email from N. Ravindran to K. Corrigan	EIG_KEP_00259344-345	12/6/2013	None
127	Email from B. Thomas to K. Talbot	EIG_KEP_00260519-533	2/1/2014	None
128	Sete Brasil - Overview 3Q'14 Update	EIG_KEP_00260601-651	2014	None
129	Email from J. Bernardes to K. Lowder	EIG_KEP_00262886-888	1/20/2015	None
130	Email from B. Thomas to J. Bernardes <i>et al.</i>	EIG_KEP_00262889-891	7/15/2015	None

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131	Sete Brasil February 2015	EIG_KEP_00266976-981	2/2015	None
132	Email from B. Thomas to K. Corrigan	EIG_KEP_00280676	4/4/2015	None
133	Email from S. Lee to G. Israel <i>et al.</i>	KEPPEL00007815-816	2/22/2013	None
134	Email from K.C. Kwok to zwi@eaglebr.com.br <i>et al.</i>	KEPPEL00010310	7/30/2011	None
135	Email from C. H. Tong to K. C. Kwok and Y.Y. Chow	KEPPEL00011057	1/17/2013	None
136	Email from A. Farahto K. C. Kwok <i>et al.</i>	KEPPEL00030275-276	8/15/2011	None
137	Email and attachments from S. Pan to C.B. Choo, <i>et al.</i>	KEPPEL00040804-862	--	None
138	Email from J. Chow to N. Marsuki	KEPPEL00045696	9/19/2011	None
139	Email from N. Marsuki to N. Marsuki and J. Chow	KEPPEL00280920	9/19/2011	None
140	Email from C. B. Chooto E. Ho <i>et al.</i>	KEPPEL00429725-729	8/6/2012	None
141	Email from B. Ng to G. Israel <i>et al.</i>	KEPPEL00457152-156	6/6/2013	None
142	EPC Contract between Urca Drilling and Fernvale	KEPPEL00490690-768	12/16/2011	KOM Redactions
143	Email from K. K. Choong to Y. Y. Chow	KEPPEL00495287-291	12/30/2014	None
144	Email from J. Chow to N. Marsuki	KEPPEL00555190	8/7/2012	None
145	Email from K. C. Kwok to Y. Y. Chow	KEPPEL00567865-866	12/11/2014	None
146	Email from L. P. Tan to G. Israel <i>et al.</i>	KEPPEL00589219-228	6/7/2013	None
147	Email from T. Sam to J. Chow	KEPPEL00635162-169	1/23/2015	None
148	Email from N. J. Wong to J. Chow <i>et al.</i>	KEPPEL00641136-138	2/2/2015	None
149	Keppel Organizational Chart	KEPPEL_00000153-160	2009	None

Exhibit No.	Description	Bates	Date	Redactions
150	Notice to Bidders	KEPPEL00414911	6/11/2010	None
151	Inter-Office Correspondence from S. Kim <i>et al.</i> to J. Edling <i>et al.</i>	EIG_KEP_00132161-163	1/13/2012	EIG Redactions
152	Deferred Prosecution Agreement	--	12/22/2017	None
153	DX114 – Sete Brasil Presentation	EIG_KEP00134494-498	--	None
154	Minutes of Energy Fund XV EIG Investment Committee Meeting	EIG_KEP_00260323-326	9/16/2011	None